

EXHIBIT D

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Attorneys for
GOOGLE LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SAN FRANCISCO

ANIBAL RODRIGUEZ, *et al.* individually and
on behalf of all other similarly situated,

Plaintiffs,

vs

GOOGLE LLC, *et al.*

Defendant.

Case No. 3:20-CV-04688 RS

**DECLARATION OF LORI C. ARAKAKI IN
SUPPORT OF GOOGLE LLC'S PORTION
OF JOINT LETTER BRIEF RE: GOOGLE'S
SEARCH TERMS**

Judge: Hon. Alex G. Tse

Courtroom: A – 15th Floor

Trial Date: Not Yet Set

1 I, LORI C. ARAKAKI, declare:

2 1. I am an attorney licensed to practice law in the State of California and am an
3 associate with the law firm of Willkie Farr & Gallagher LLP, located at One Front Street, San
4 Francisco, California 94111, counsel for Defendant Google LLC (“Google”) in the above-
5 captioned action. Unless otherwise stated, the facts I set forth in this declaration are based on my
6 personal knowledge. If called to testify as a witness, I could and would testify competently to
7 such facts under oath.

8 2. I submit this declaration in support of Google’s portion of the Parties’ Joint Letter
9 Brief re: Google’s Search Terms for the Additional 19 Custodians (“Letter Brief”).

10 3. **Exhibit C** is a true and correct copy of a set of charts that were compiled at my
11 direction. I created the charts with the assistance of a paralegal in my office and a member of
12 Google’s in-house legal team, both of whom were working under my supervision and at my
13 direction. The charts identify the search terms Google proposes to employ and those in dispute for
14 the 19 custodians identified at page 1. Exhibit C also identifies hit counts for certain search
15 strings in dispute. The “total” number of hits identified at pages 1, 3, and 5–9 represent the total
16 number of documents that would be reviewed for each “Topic” of search terms, and in total for all
17 search terms, after accounting for documents that contain multiple search terms. These hit counts
18 and totals are accurate to the best of my knowledge.

19 4. Considering both past experience in and circumstances unique to this case, I have
20 worked with my team to calculate an expected time for review of documents. Based on that, I am
21 informed and believe that it will take an estimated 9,700 hours to review the 342,798 documents
22 that would be selected for review if the Court adopts Plaintiffs’ proposed order.

23 I declare under penalty of perjury under the laws of the United States of America that the
24 foregoing is true and correct.

25 Executed April 28, 2022, at Austin, Texas.

26
27 /s/ Lori C. Arakaki
28 LORI C. ARAKAKI